



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

1200 Sixth Avenue, Suite 900  
Seattle, Washington 98101-3140

MAR 17 2016

OFFICE OF  
COMPLIANCE AND ENFORCEMENT

Reply to: OCE-101

**CERTIFIED MAIL-RETURN RECEIPT REQUESTED**

**NOTICE OF VIOLATION**

Ms. Patricia de LaBruere  
Airport Manager  
Juneau International Airport  
1873 Shell Simmons Drive  
Juneau, Alaska 99801

Re: Juneau International Airport  
NPDES Identifier Number AKR05CD55

Dear Ms. de LaBruere:

On August 25, 2015, the United States Environmental Protection Agency (EPA) visited Juneau International Airport in Juneau, Alaska. The purpose of this inspection was to determine Juneau International Airport's compliance with the requirements of the Clean Water Act (CWA) and the Multi-Sector General Permit ("Permit") that covers the facility, National Pollution Discharge Elimination System (NPDES) Identifier Number AKR05CD55. I would like to express my appreciation for your staff's time and cooperation during the inspection.

**AUGUST 2015 INSPECTION**

1. Part 2.1.2.4 of the Permit states that the permittee must minimize the potential for leaks, spills and other releases that may be exposed to stormwater and develop plans for effective response to such spills if or when they occur. At a minimum, you must implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases. Employees who may cause, detect, or respond to a spill or leak must be trained in these procedures and have necessary spill response equipment available.

At the time of the inspection, the inspector noted that the spill kit was not located near the fueling point where it would be immediately accessible to allow employees to expeditiously stop, contain, and clean up leaks, spills, or other releases. This is a violation of Part 2.1.2.4 of the Permit.

2. Part 5.4 of the Permit states that the permittee is required to keep the following inspection, monitoring, and certification records with your SWPPP that together keep your records complete and up-to-date, and demonstrate your full compliance with the conditions of this permit: Records of employee training, including date training received.

At the time of the inspection, the inspector noted that the employees' stormwater training records were not with the Stormwater Pollution Prevention Plan (SWPPP) and were not available for review. This is a violation of Part 5.4 of the Permit.

3. Part 7.2 of the Permit states that the permittee must submit an annual report to EPA that includes the findings from your Part 4.3 comprehensive site inspection and any corrective action documentation as required in Part 3.4.

At the time of the inspection, the inspector noted that the Juneau International Airport could not show that it had completed and filed the 2014 Annual Report. This is a violation of Part 7.2 of the Permit.

4. Part 8.S.5.1 of the Permit states that the permittee must, at a minimum, conduct routine facility inspections at least monthly during the deicing season (e.g., October through April for most mid-latitude airports).

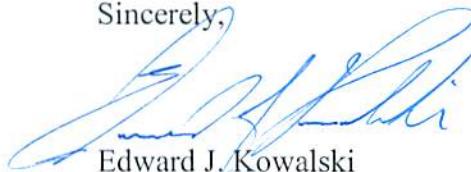
At the time of the inspection, the inspector noted that Juneau International Airport could not show an inspection record for November 2014. This is a violation of Part 8.S.5.1 of the Permit.

On December 21, 2015, the NPDES Electronic Reporting Rule became effective. Permittees with a DMR requirement will have one year from this date to submit DMRs through NetDMR. Additional information is enclosed (Enclosure A).

Although our goal is to ensure NPDES facilities comply fully with their permits, the ultimate responsibility rests with the permittee. As such, I want to strongly encourage you to continue your efforts to maintain full knowledge of the Permit requirements, and other appropriate statutes, and to take appropriate measures to ensure compliance. Notwithstanding your response to this letter, EPA retains all rights to pursue enforcement actions to address these and any other violations.

I have enclosed a copy of the inspection report (Enclosure B). If you have any questions concerning this matter, please do not hesitate to contact Raymond Andrews of my staff at (206) 553-4252.

Sincerely,



Edward J. Kowalski  
Director

Enclosure

cc: Mr. Michael Solter  
Alaska Department of Environmental Conservation  
michael.solter@alaska.gov

Mr. Ken Nichols  
Airport Engineer  
Juneau International Airport, Alaska  
ken.nichols@jnuairport.com